

Candice Arceneaux  
January 26, 2011

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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION

CONNIE J. WHITWORTH                   \*  
  \*  
VS.                                       \* C.A. NO. 1:10-CV00203  
  \*  
BAKER HUGHES, INCORPORATED        \*

\* \* \* \* \*

ORAL AND VIDEOTAPED DEPOSITION OF  
CANDICE ARCENEUX

TAKEN ON JANUARY 26, 2011

\* \* \* \* \*

ORAL AND VIDEOTAPED DEPOSITION of CANDICE ARCENEUX,  
produced as a witness at the instance of the Plaintiff,  
and duly sworn, was taken in the above-styled and  
numbered cause on the 26th day of January, 2011, from  
10:07 a.m. to 11:42 a.m., before SYLVIA KERR, CSR, RPR,  
CRR in and for the State of Texas, reported by machine  
shorthand, at the Omni Corpus Christi Hotel, 900 N.  
Shoreline Boulevard, Copano Room, Corpus Christi,  
Nueces County, Texas, pursuant to the Federal Rules of  
Civil Procedure.

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1 resources and report anybody else?

2 A. Yes, ma'am.

3 Q. All right. What other reports have you made  
4 to HR while you've worked with Baker Hughes?

5 A. It was a verbally harassing issue that I had  
6 with -- I'm assuming his title was ops coordinator. He  
7 was verbally abusive.

8 Q. All right. And where were you working when  
9 you had problems with this person?

10 A. In Beaumont.

11 Q. Okay. And you said he was an ops coordinator?

12 A. I think that's what his title was.

13 Q. What was his name?

14 A. Jack Sherman.

15 Q. And when you say he was verbally abusive, can  
16 you describe the nature of the verbal abuse?

17 A. Just mean, name calling, mean.

18 Q. What kind of names did he call you?

19 A. The one that I remember is dumb bitch.

20 Q. And would he call you things like dumb bitch  
21 frequently or occasionally?

22 A. Frequently.

23 Q. And as a result of that, your workplace was  
24 made uncomfortable; is that fair to say?

25 A. Yes, ma'am.

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1 Q. And who was the district manager at the time  
2 that this man was calling you that kind of name?

3 A. Bruce Stevens.

4 Q. Did you tell Bruce that this man was calling  
5 you that?

6 A. Yes, ma'am.

7 Q. Did he do anything about it?

8 A. No, ma'am.

9 Q. And as a result of Bruce not doing anything  
10 about that, did you have to go to the Baker Hughes' HR?

11 A. Yes, ma'am.

12 Q. And do you remember who you reported this  
13 abuse to in HR?

14 A. I don't remember their name.

15 Q. Was your complaint resolved?

16 A. Yes, ma'am.

17 Q. Do you know how it was resolved?

18 A. He was terminated.

19 Q. All right. Did you understand that he was  
20 terminated because of the way he had been talking to  
21 you?

22 A. Yes, ma'am.

23 Q. And did Baker Hughes tell you that this man  
24 was being terminated?

25 A. Yes, ma'am.

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1 Q. All right. In other words, Candy, you're not  
2 going to have to worry about this harassment on-the-job  
3 anymore because Jack is being terminated?

4 A. Yes, ma'am.

5 Q. Likewise, when Bruce Stevens was transferred  
6 to Louisiana after making your work environment hostile  
7 due to his talk of a sexual nature, did Baker Hughes HR  
8 tell you, Candy, we're taking care of the problem, I'm  
9 moving him out of here and you can feel good coming  
10 back to work because your environment is not going to  
11 be hostile anymore?

12 A. I don't remember HR specifically telling me  
13 that, but a manager that was like a stand-in manager  
14 until Rodney was brought in had told me that it would  
15 be a better work environment. They had put me on a  
16 couple of weeks leave until they figured out what they  
17 were going to do with him, and they assured me that  
18 everything would be fine when I came back.

19 Q. All right. And you went back to work after  
20 being on leave because you had been assured that the  
21 problem had been taken care of, correct?

22 A. Yes, ma'am.

23 Q. And I would assume you didn't want to go back  
24 to work until the problem was taken care of, correct?

25 A. Right.



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1 comments that Victor made to Kathy.

2 A. That's -- that's what I know, that Victor had  
3 told her that she was living in sin with her  
4 ex-husband.

5 Q. And do you remember being told that Victor  
6 Carver made the comment that Kathy Alaniz should get a  
7 dildo rather than live in sin?

8 A. No, I don't recall that part.

9 Q. And are you telling me that you learned of  
10 that comment that Victor Carver made only through  
11 Connie?

12 A. Yeah. Yes.

13 Q. You never discussed that with Kathy?

14 A. No.

15 Q. What was Kathy Alaniz's position at the time?

16 A. I guess she was a department admin at that  
17 time.

18 Q. When Connie told you that she was having  
19 problems with Victor Carver, did you advise her that  
20 she needed to have some proof?

21 A. Yes.

22 Q. What did you tell Connie about that?

23 A. I told her that if the verbal harassment was  
24 as bad as she said it was, that she needed to get a  
25 recorder and record it.